

Attachment 4

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signature pages

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL NO. 3047

Civil Case No. 4:22-md-03047-YGR:

Honorable Yvonne Gonzalez Rogers

**META DEFENDANTS' RESPONSES
AND OBJECTIONS TO PLAINTIFFS'
THIRD SET OF REQUESTS FOR
ADMISSION**

Defendants Meta Platforms, Inc., Facebook Payments, Inc., Siculus, Inc., Facebook Operations, LLC, and Instagram, LLC, (collectively, "Defendants" or "Meta"), by and through their attorneys, Covington & Burling, LLP, submit their responses and objections to Plaintiffs' Third Set of Requests for Admission ("Requests") served on February 21, 2025.

Meta's responses to the Requests are made to the best of its current knowledge, information, and belief. Meta reserves the right to further supplement or amend any of its responses should future investigation indicate that such supplementation or amendment is necessary.

HIGHLY CONFIDENTIAL (COMPETITOR)**RESPONSES AND OBJECTIONS TO ALL REQUESTS**

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3 1. Meta objects to Requests that do not describe each category of information with reasonable
4 particularity, and/or are otherwise duplicative, vague, ambiguous, overbroad, unduly burdensome, and/or
5 disproportionate to the needs of the litigation. Where appropriate, Meta has provided definitions for
6 ambiguous terms contained in these Requests and/or clarified the scope of its response as indicated in the
7 specific objections below.

8 2. Meta has not completed its investigation or discovery in this case. Accordingly, these
9 responses are based upon the best knowledge, information, and belief of Meta at this time. Meta reserves
10 the right to make further responses if it appears that any omission or error has been made in connection
11 with these responses or that more accurate information has become available. These responses are made
12 without prejudice to the right of Meta to use in later discovery or to present at trial such evidence that may
13 be later discovered or evaluated.

14 3. Meta objects to the Requests on the ground to the extent they seek a legal conclusion and/or
15 would require Meta to reach a legal conclusion in order to prepare a response.

16 4. Meta objects to the Requests on the ground and to the extent that they call for information
17 more appropriately sought through other types of discovery, such as requests for production of documents,
18 special interrogatories, and/or depositions.

19 5. Meta objects to the Requests on the ground and to the extent that they seek confidential or
20 proprietary business information, trade secrets, commercially sensitive information, or confidential
21 personal information of Meta or a non-party. Responsive, non privileged information, if discoverable,
22 will be provided subject to the terms of the Protective Order entered by the Court. Meta reserves the right
23 to seek additional protections beyond those provided in the Protective Order to the extent appropriate for
24 any particularly sensitive information and/or to object to providing such information altogether if, for
25 example, their relevance is substantially outweighed by the risk of harm posed by provision of the
26 information in light of the protections available.

27 6. Meta objects to the Requests on the ground and to the extent that they seek the disclosure
28 of source code and/or information related to source code. Discoverable source code and/or information

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related to source code will be provided subject to the terms of the Source Code Protective Order entered by the Court on February 27, 2025.

7. Meta objects to the Requests and accompanying Definitions and Instructions insofar as they seek to impose obligations in excess of or otherwise different from those imposed by the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules of the United States District Court for the Northern District of California, or any other applicable federal or state law. Meta will comply with applicable rules, laws, and court orders.

8. Meta objects to the Requests on the ground and to the extent they purport to impose duties or requirements on Meta beyond those contained in the ESI Order and other orders, rules, or agreements applicable to this case.

9. The following responses are made subject to all objections of competence, relevance, materiality, propriety, and admissibility and are subject to all objections that would require the exclusion of any statement, material, or information provided if such discovery request was asked of, or any statement, material, or information provided was made by a witness present and testifying in court. All such objections are reserved and may be interposed at the time of trial.

10. Meta's responses are made without waiving or intending to waive (a) the right to object on any ground to the use of these responses, or their subject matter, in any subsequent proceeding or the trial of this or any other action; (b) the right to object to a demand for further responses to this or any other discovery involving or related to the subject matter of the Requests; and (c) the right at any time to revise, correct, add to, or clarify any or all of the objections.

11. Meta objects to the Requests on the ground and to the extent that they seek information protected from disclosure by any applicable privilege, the work-product doctrine, and/or any other applicable privilege, immunity, or protection. Any production or disclosure of privileged or protected information does not result in the waiver of any privilege or protection, including subject matter waiver, associated with such privileged or protected information. *See* Dkt. No. 248 at 1. To the extent Meta withholds information it has identified in response to any Request, based on such an assertion of privilege, Meta will produce a privilege log pursuant to the Privilege Log Protocol entered by the Court.

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1 12. Meta objects to the Requests on the ground and to the extent they call for information that
2 is outside of its possession, custody, or control and to the extent they seek information that is already in
3 Plaintiffs' possession, custody, or control; information that is a matter of public record; or information
4 that is available to Plaintiffs from public sources.

5 13. Meta objects to the Requests on the ground and to the extent they seek information that is
6 not relevant to any party's claim or defense and/or are overbroad, unduly burdensome, and not
7 proportional to the needs of the case. In responding to these Requests, Meta does not concede the
8 relevance or admissibility of the information sought and reserves the right to seek to exclude such
9 information.

10 14. Meta objects to the Requests on the ground and to the extent that they seek information
11 relating to or policies applicable to users located outside of the United States and/or features not available
12 in the United States. Meta will provide information relating only to and policies applicable only to users
13 in the United States.

14 15. Meta's interpretation of Plaintiffs' Requests are indicated in its specific responses and
15 objections to each Request, including whether Meta objects on the grounds that the Request is vague,
16 ambiguous, and/or overly broad.

17 16. Meta objects to the Requests on the ground and to the extent that they seek documents or
18 other materials that are not related to Youth Users or implicated features or addictive/compulsive use or
19 harms to mental health. Meta will generally interpret Youth Users to mean users that are at least 13 years
20 of age and under the age of 18. Wherever in the specific responses below Meta agrees to produce
21 document(s) to the extent "relevant" to the issues in the case, Meta defines "relevant" for the purposes of
22 these responses only to mean documents that discuss Youth Users or one or more of the implicated features
23 or addictive/compulsive use or harms to mental health. Meta reserves its rights to assert a more targeted
24 scope of relevance for the purposes of dispositive motions and trial.

25 17. Meta objects to the Requests on the ground and to the extent that they seek information
26 regarding users under the age of 13, as Meta does not permit individuals under 13 to access Facebook or
27 Instagram.
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1 18. Meta objects to the Requests on the ground and to the extent they are not sufficiently
2 concise nor directed to a single fact, and therefore are not a proper request for admission amenable to a
3 reasonable admission or denial. *See E & J Gallo Winery v. Encana Energy Servs., Inc.*, 2004 WL
4 7342780, at *2 (E.D. Cal. Sept. 16, 2004) (“Requests for admission must be ‘simple and concise and state
5 facts singly, so that they can easily and coherently be admitted or denied.’ . . . Requests for admission
6 must be limited to singular relevant facts . . . [and] ‘may not contain compound, conjunctive, or disjunctive
7 (e.g., “and/or”) statements.[’]”); *City of Colton v. Am. Promotional Events, Inc.*, 2012 WL 13013378, at
8 *1 (C.D. Cal. Jan. 27, 2012) (“Case law requires that a request for admission should be ‘phrased simply
9 and directly so that it can be admitted or denied without explanation.’” (quoting *Safeco of America v.*
10 *Rawstron*, 181.441 (C.D. Cal. 1998)); *Runway TV, LLC v. De Gray*, 2020 WL 6712253, at *2 (C.D. Cal.
11 Sept. 15, 2020) (“Requests for admissions are required to be simple and direct, and should be limited to
12 singular relevant facts. . . . [O]bjections to requests for admissions as vague, ambiguous, overbroad and
13 burdensome [have been] sustained where requests for admissions not simple concise statements of fact,
14 but instead contained vague and ambiguous wording that did not allow defendants fairly to admit or deny”)
15 (quoting *Dubin v. E.F. Hutton Group, Inc.*, 125 F.R.D. 372, 376 (S.D.N.Y. 1989)).

16 19. Meta objects to Definition No. 2 (“collect,” “collects,” and “collection”) as vague and
17 ambiguous in that Plaintiffs assign to those terms the meaning provided in 16 C.F.R. § 312.2 yet appear
18 also to use one or more of those terms in different contexts, using apparently their more ordinary meaning,
19 for example in Requests Nos. 47-48. Meta does not attribute to those terms Plaintiffs’ assigned meaning
20 in those Requests. Meta objects to the terms to the extent that they suggest that individuals under the age
21 of 13 are permitted users of Facebook or Instagram, which they are not, or to the extent that they assume
22 Meta knowingly collects personal information from individuals under the age of 13.

23 20. Meta objects to Definitions No. 3 (“Facebook Platform” or “Facebook”) and No. 4
24 (“Instagram Platform” or “Instagram”) as vague, ambiguous, overbroad, unduly burdensome, and not
25 proportional to the needs of the case under the standard set forth in FRCP Rule 26(b)(1) to the extent they
26 include versions of Facebook and Instagram that were not publicly released or publicly available during
27 the Relevant Time Period, as well as features or surfaces not publicly released or publicly available during
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1 the Relevant Time Period. Meta interprets these terms as referring only to publicly available versions
2 during the Relevant Time Period, and conducted its investigation and preparation accordingly.

3 21. Meta objects to Definition No. 5 (“personal information”) as vague and ambiguous in that
4 Plaintiffs assign to that term the meaning provided in 16 C.F.R. § 312.2 yet appear also to use that term
5 or the term “information” in different contexts, including by using apparently their more ordinary
6 meaning, for example in Requests Nos. 46-48. Meta does not attribute to those terms Plaintiffs’ assigned
7 meaning in those Requests. Meta objects to the terms to the extent that they suggest that individuals under
8 the age of 13 are permitted users of Facebook or Instagram, which they are not, or to the extent that they
9 assume Meta knowingly collects personal information from individuals under the age of 13.

10 22. Meta objects generally to Definition No. 7 (“User”) as vague, ambiguous, overbroad,
11 unduly burdensome, and not proportional to the needs of the case to the extent it includes users of any
12 Meta social media service other than Facebook and Instagram, or individuals without an account on either
13 platform, or individuals under thirteen (13) years of age, or users that are eighteen (18) years of age or
14 older. Meta interprets this term as referring only to individuals with an account on either Facebook or
15 Instagram, as Facebook and Instagram are the only social media services at issue in Plaintiffs’ operative
16 complaint, and to individuals at least 13 years of age, as individuals under 13 years of age are not permitted
17 users of Facebook and Instagram, and conducted its investigation and preparation accordingly. Meta will
18 generally interpret the term “Youth Users” to mean Users that are at least 13 years of age and under the
19 age of 18.

20 23. Meta objects to Definition No. 8 (“User Control”) as vague, ambiguous, overbroad, unduly
21 burdensome, and not proportional to the needs of the case to the extent it uses the undefined phrases
22 “allows,” “tailor their profile or experience,” and “own unique preferences.” Meta interprets this term to
23 be limited to the specifically listed features.

24 24. Meta objects to Definition No. 10 (“You,” “Your,” “Defendant,” or “Defendants”) as
25 vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the
26 extent it includes entities and individuals over which Meta exercises no control or includes subsidiaries or
27 affiliate services that are not at issue in this action. Meta construes this term as limited to Facebook and
28 Instagram, the only platforms at issue in Plaintiffs’ operative complaint.

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1 25. Meta objects to Definition No. 11 (“Your Platforms”) as vague, ambiguous, overbroad,
2 unduly burdensome, and not proportional to the needs of the case to the extent it includes versions of
3 Instagram or Facebook’s platforms not publicly released or publicly available during the Relevant Time
4 Period, as well as features or surfaces not publicly released or publicly available during the Relevant Time
5 Period.

6 26. Meta objects to Definition No. 12 (“Youth”) to the extent it encompasses users that are
7 under the age of 13 or over the age of 17. Meta will generally interpret this term to mean users that are at
8 least 13 years of age and under the age of 18.

9 27. Meta objects to the characterization of the “Relevant Time Period” specified in Instruction
10 No. 5 (“2012 to the present”). Since the term is overbroad and ambiguous, and unless otherwise specified
11 in response to a particular Request, Meta will construe the relevant time period as the period(s) ordered
12 by Judge Kang in DMO No. 7 (i.e., January 1, 2012 – April 1, 2024 generally with other time periods for
13 specific features).

14 28. By responding to a Request with a defined term, Meta is not by implication agreeing with
15 any such definition.

16 29. Meta is willing to meet and confer concerning the Requests and these responses.
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RESPONSES AND OBJECTIONS TO SPECIFIC REQUESTS FOR ADMISSION**REQUEST FOR ADMISSION NO. 18:**

18 Admit that You do not provide notice (as described in 16 CFR § 312.4) of what information You
19 collect from Children on Facebook or Instagram, how You use such information, or Your disclosure
20 practices for such information.

RESPONSE:

21 Meta incorporates its Responses and Objections to All Requests by reference as though fully set
22 forth herein. Meta further objects to this Request on the ground that its use of the undefined phrases
23 “information,” “use such information,” and “disclosure practices” renders this Request vague and
24 ambiguous. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the
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1 needs of the case to the extent that it seeks information without limitation to the Relevant Time Period.
2 Accordingly, Meta will limit its response to this Request to the Relevant Time Period. Meta objects to
3 this request to the extent it suggests that individuals under the age of 13 are permitted users of Facebook
4 or Instagram, which they are not. Meta will interpret “information” to mean “personal information” as
5 reflected in 15 U.S.C. § 6501 and 16 CFR § 312.2.

6 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
7 Except as expressly set out below, Meta DENIES this Request for Admission.

8 Since at least 2012, Facebook’s Terms of Service and Instagram’s Terms of Use have prohibited
9 individuals under the age of 13 from creating a Facebook or Instagram account. Persons who enter a date
10 of birth indicating that they are under 13 during the Facebook or Instagram registration process are not
11 permitted to create an account, and Meta does not store personal information for such persons. If Meta
12 has reliable evidence indicating that an individual who has created an account is under the age of 13, then
13 Meta will place the user in an age checkpoint. If the user is unable to demonstrate that they are 13 years
14 of age or older, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their
15 account is deleted in accordance with Meta’s standard deletion protocols. When Meta deletes a user’s
16 account, Meta’s systems delete, as defined in 16 CFR § 312.2, all data associated with the account. The
17 Terms of Service and Terms of Use also state that to use Facebook or Instagram individuals must be at
18 least 13 years old. Therefore, because during the Relevant Time Period, Meta has not knowingly collected
19 personal information from individuals under 13 on Facebook or Instagram, regardless of whether those
20 individuals have been logged into a Facebook or Instagram account, Meta has not provided notice as
21 described in 16 CFR § 312.4.

22 Meta reserves the right to supplement or modify its response based upon documents or information
23 identified over the course of discovery.

REQUEST FOR ADMISSION NO. 19:

25 Admit that You do not obtain Verifiable parental consent to collect, use, and/or disclose personal
26 information that You collect from Children who visit Facebook with or without logging into an account.
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HIGHLY CONFIDENTIAL (COMPETITOR)**RESPONSE:**

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period. Accordingly, Meta will limit its response to this Request to the Relevant Time Period. Meta further objects to this Request on the ground that its use of the undefined phrases “use” and “disclose” renders this Request vague and ambiguous. Meta objects to this request to the extent it suggests that individuals under the age of 13 are permitted users of Facebook or Instagram, which they are not. Meta interprets the term “obtain verifiable consent” and “personal information,” to have the meanings reflected in 15 U.S.C. § 6501 and 16 CFR § 312.2.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly set out below, Meta DENIES this Request for Admission.

Since at least 2012, Facebook’s Terms of Service have prohibited individuals under the age of 13 from creating a Facebook account. Persons who enter a date of birth indicating that they are under 13 during the Facebook registration process are not permitted to create an account, and Meta does not store personal information for such persons. If Meta has reliable evidence indicating that an individual who has created an account is under the age of 13, then Meta will place the user in an age checkpoint. If the user is unable to demonstrate that they are 13 years of age or older, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with our standard deletion protocols. When Meta deletes a user’s account, Meta’s systems delete, as defined in 16 CFR § 312.2, all data associated with the account. The Terms of Service also state that to use Facebook individuals must be at least 13 years old. Therefore, because during the Relevant Time Period Meta has not knowingly collected data from any individuals under 13 on Facebook, regardless of whether those individuals have been logged into a Facebook account, Meta has not sought verifiable consent from parents of individuals under 13 whom Meta does not know exist.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

HIGHLY CONFIDENTIAL (COMPETITOR)**REQUEST FOR ADMISSION NO. 20:**

Admit that You do not provide a means for a parent to review the personal information collected from their Children who visit Facebook with or without logging into an account, in a manner described in 16 CFR § 312.6(a)(3).

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period. Accordingly, Meta will limit its response to this Request to the Relevant Time Period. Meta further objects to this Request on the ground that its use of the undefined phrases “visit,” “review,” and “with or without logging into” renders this Request vague and ambiguous. Meta objects to this request to the extent it suggests that individuals under the age of 13 are permitted users of Facebook or Instagram, which they are not. Meta interprets the terms “collected,” “parent,” and “personal information” to have the meanings reflected in 15 U.S.C. § 6501 and 16 CFR § 312.2.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly set out below, Meta DENIES this request.

Since at least 2012, Facebook’s Terms of Service have prohibited individuals under the age of 13 from creating a Facebook account. Persons who enter a date of birth indicating that they are under 13 during the Facebook registration process are not permitted to create an account, and Meta does not store personal information for such persons. If Meta has reliable evidence indicating that an individual who has created an account is under the age of 13, then Meta will place the user in an age checkpoint. If the user is unable to demonstrate that they are 13 years of age or older, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with Meta’s standard deletion protocols. When Meta deletes a user’s account, Meta’s systems delete, as defined in 16 CFR § 312.2, all data associated with the account. The Terms of Service also state that to use Facebook individuals must be at least 13 years old. Therefore, because during the Relevant Time Period, Meta has not knowingly collected personal information from individuals under 13 on Facebook, regardless of

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whether those individuals have been logged into a Facebook account, Meta has not provided parents means to review personal information of their children under 13 whom Meta does not know exist.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 21:

Admit that You do not provide a means for a parent to refuse to permit the further use or maintenance of the information collected from their Child on Your Platforms, in the manner described in 16 CFR § 312.6(a)(2).

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta further objects to this Request on the ground that its use of the undefined phrases “maintenance of the information collected” and “information” renders this Request vague and ambiguous. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period. Accordingly, Meta will limit its response to this Request to the Relevant Time Period. Meta objects to this request to the extent it suggests that individuals under the age of 13 are permitted users of Facebook or Instagram, which they are not. Meta interprets the terms “collected,” “parent,” and “personal information” to have the meanings reflected in 15 U.S.C. § 6501 and 16 CFR § 312.2. Meta will interpret “information” to mean “personal information” as reflected in 15 U.S.C. § 6501 and 16 CFR § 312.2.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly set out below, Meta DENIES this Request for Admission.

Since at least 2012, Facebook’s Terms of Service and Instagram’s Terms of Use have prohibited individuals under the age of 13 from creating a Facebook or Instagram account. Persons who enter a date of birth indicating that they are under 13 during the Facebook or Instagram registration process are not permitted to create an account, and Meta does not store personal information for such persons. If Meta has reliable evidence indicating that an individual who has created an account is under the age of 13, then Meta will place the user in an age checkpoint. If the user is unable to demonstrate that they are 13 years of age or older, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their

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1 account is deleted in accordance with our standard deletion protocols. When Meta deletes a user's
2 account, Meta's systems delete, as defined in 16 CFR § 312.2, all data associated with the account. As
3 such, since 2012, Meta has not provided parents a means, as described in 16 CFR § 312.6(a)(2), to
4 (1) refuse to permit the further use of personal information collected from their children under 13, or (2) to
5 direct the operator to delete the child's personal information, because individuals under 13 are not
6 authorized to open an account on Instagram or Facebook and Meta therefore does not knowingly collect
7 personal information from individuals under 13. The Terms of Service and Terms of Use also state that
8 to use Facebook or Instagram individuals must be at least 13 years old. Therefore, because during the
9 Relevant Time Period, Meta has not knowingly collected personal information from individuals under 13
10 on Facebook or Instagram, regardless of whether those individuals have been logged into a Facebook or
11 Instagram account, Meta has not provided parents a means to refuse to permit the further use of personal
12 information from their children whom Meta does not know exist.

13 Meta reserves the right to supplement or modify its response based upon documents or information
14 identified over the course of discovery.

REQUEST FOR ADMISSION NO. 22:

16 Admit that, during the period from October 2020 until December 2021, when You determined a
17 User was likely a Child and disabled their Facebook or Instagram account, You did not immediately
18 disable any other Facebook or Instagram account the User had linked in the Accounts Center feature.

RESPONSE:

20 Meta objects to this Request on the ground that its use of the undefined phrases "determined"
21 "likely" and "immediately" renders this Request vague and ambiguous. Meta will interpret "Accounts
22 Center feature" to mean Meta's Accounts Center feature, as described on Meta's About Accounts Center
23 webpage ([https://www.meta.com/help/accounts-center/?srsltid=AfmBOorWeY0fGtzJXgA4c-
24 9eWCG94Lj2riXMVSs4gyGvv44LYB6NVdHW](https://www.meta.com/help/accounts-center/?srsltid=AfmBOorWeY0fGtzJXgA4c-9eWCG94Lj2riXMVSs4gyGvv44LYB6NVdHW)). Meta will interpret "determined" to refer to the
25 process in which Meta places an account potentially belonging to an individual under 13 into a checkpoint
26 and if the user is unable to demonstrate that they are 13 years of age or older, by failing to appeal or
27 making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with our
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standard deletion protocols. When Meta deletes a user's account, Meta's systems delete, as defined in 16 CFR § 312.2, all data associated with the account.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 23:

Admit that, from at least April 2016 through September 2020, when You determined a User was likely a Child and disabled their Facebook or Instagram account, You did not immediately disable any other Facebook or Instagram account the User had linked in the Linked Accounts feature.

RESPONSE:

Meta objects to this Request on the ground that its use of the undefined phrases "determined," "likely," "immediately," and "Linked Accounts feature" renders this Request vague and ambiguous. Meta will interpret "Linked Accounts feature" to refer to features, other than Meta's Accounts Center as described at <https://www.meta.com/help/accounts-center/?srsltid=AfmBOorWeY0fGtzJXgA4c-9eWCG94Lj2riXMVSs4gyGvv44LYB6NVdHW>, that allowed individuals to take affirmative steps to connect Facebook or Instagram accounts across platforms. Meta will interpret "determined" to refer to the process in which Meta places an account potentially belonging to an individual under 13 into a checkpoint and if the user is unable to demonstrate that they are 13 years of age or older by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with our standard deletion protocols. When Meta deletes a user's account, Meta's systems delete, as defined in 16 CFR § 312.2, all data associated with the account.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

HIGHLY CONFIDENTIAL (COMPETITOR)**REQUEST FOR ADMISSION NO. 24:**

Admit that Exhibit A, Meta's Form 10-K for year 2024, accurately reports Meta's financial results as reported to the Securities & Exchange Commission.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases "accurately reports" and "financial results" renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta ADMITS the Annual Report on its United States Securities and Exchange Commission Form 10-K for the fiscal year ended December 31, 2024 fully complies with the requirements of Sections 13(a) or 15(d) of the Securities Exchange Act of 1934; and the information contained in the Report fairly presents, in all material respects, the financial condition and results of operations of the Company for the periods presented therein. *See, e.g.*, Exhibits 32.1 and 32.2 to United States Securities and Exchange Commission Form 10-K for Meta Platforms, Inc. for the fiscal year ended December 31, 2024.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 25:

Admit that for fiscal year 2024, Meta reported \$164,501,000,000.00 in gross revenue to the Securities & Exchange Commission.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases "fiscal year 2024" and "gross revenue" renders this Request vague and ambiguous.

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Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta ADMITS it reported \$164,501 (in millions) in total revenue for the year ended December 31, 2024 on its United States Securities and Exchange Commission Form 10-K for the fiscal year ended December 31, 2024. *See, e.g.*, United States Securities and Exchange Commission Form 10-K for Meta Platforms, Inc. for the fiscal year ended December 31, 2024 at 71.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 26:

Admit that for fiscal year 2024, Meta reported \$69,380,000,000.00 in net revenues to the Securities & Exchange Commission.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “fiscal year 2024” and “net revenue” renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 27:

Admit that for fiscal year 2024, Meta reported \$5,070,000,000.00 in dividends to the Securities & Exchange Commission.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or

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1 Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases
2 “fiscal year 2024” and “dividends” renders this Request vague and ambiguous.

3 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
4 Meta DENIES this Request for Admission. Meta admits it reported total dividends and that dividend
5 equivalents paid were \$5.07 billion for the year ended December 31, 2024 on its United States Securities
6 and Exchange Commission Form 10-K for the fiscal year ended December 31, 2024. *See, e.g.*, United
7 States Securities and Exchange Commission Form 10-K for Meta Platforms, Inc. for the fiscal year ended
8 December 31, 2024 at 78.

9 Meta reserves the right to supplement or modify its response based upon documents or information
10 identified over the course of discovery.

REQUEST FOR ADMISSION NO. 28:

12 Admit that for fiscal year 2024, Meta reported \$52,103,000,000.00 in free cash flow to the
13 Securities & Exchange Commission.

RESPONSE:

15 Meta incorporates its Responses and Objections to All Requests by reference as though fully set
16 forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the
17 needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or
18 Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases
19 “fiscal year 2024” and “free cash flow” renders this Request vague and ambiguous. Meta defines “Free
20 Cash Flow” as net cash provided by operating activities reduced by purchases of property and equipment
21 and principal payments on finance leases. *See* United States Securities and Exchange Commission Form
22 10-K for Meta Platforms, Inc. for the fiscal year ended December 31, 2024 at 77.

23 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
24 Meta ADMITS it reported \$52,103 (in millions) in Free Cash Flow for the year ended December 31, 2024
25 on its United States Securities and Exchange Commission Form 10-K for the fiscal year ended December
26 31, 2024. *See, e.g.*, United States Securities and Exchange Commission Form 10-K for Meta Platforms,
27 Inc. for the fiscal year ended December 31, 2024 at 77.

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Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 29:

Admit that for fiscal year 2024, Meta reported \$62,360,000,000.00 in profits to the Securities & Exchange Commission.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “fiscal year 2024” and “profits” renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly set out below, Meta DENIES this Request for Admission. Meta admits it reported \$62,360 (in millions) in net income for the year ended December 31, 2024 on its United States Securities and Exchange Commission Form 10-K for the fiscal year ended December 31, 2024. *See, e.g.*, United States Securities and Exchange Commission Form 10-K for Meta Platforms, Inc. for the fiscal year ended December 31, 2024 at 71.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 30:

Admit that prior to the launch of Teen Accounts in September 2024, Instagram Platform did not default all Users under 16 years old into the platform’s strictest User Control settings.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “default” and “strictest User Control settings” renders this Request vague and ambiguous.

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Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission. Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of its investigation and discovery.

REQUEST FOR ADMISSION NO. 31:

Admit that You never disclosed to the public any statistics or results from the Bad Experiences & Encounters Framework (BEEF) surveys.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “disclosed to the public” and “results” renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission. Meta has previously disclosed information relating to Bad Experiences & Encounters Framework (BEEF) surveys to Congress. Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 32:

Admit that You never disclosed to the public any statistics or results from the Tracking Reach of Integrity Problems Survey (TRIPS).

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “disclosed to the public” and “results” renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission. Meta has previously disclosed information relating to

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Tracking Reach of Integrity Problems Survey (TRIPS) to Congress. Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 33:

Admit that Meta tracked “time spent” as a guardrail metric during certain time periods.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “guardrail metric,” “certain time periods,” and “time spent” renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta ADMITS that it has used “time spent” as a metric.

REQUEST FOR ADMISSION NO. 34:

Admit that increasing User “time spent” on Meta’s Platforms is or was an articulated goal at Meta at least once during the Relevant Time Period.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “articulated goal,” “at least once,” and “time spent” renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:

Meta ADMITS that, at least once during the Relevant Time Period, it used “time spent” as a goal.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 35:

Admit that You never disclosed to the public that increasing User “time spent” on Meta’s Platforms is or was an articulated goal at Meta.

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Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “an articulated goal at Meta” and “time spent” renders this Request vague and ambiguous.

Meta DENIES this Request for Admission, including because it has repeatedly disclosed that it tracks engagement.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 36:

Admit that the statements attributed to Eva Chen in the following article were made when Eva Chen was authorized to speak on Meta’s behalf: Sangeeta Singh-Kurtz, Instagram is building a team to stop people from feeling bad on Instagram, Quartz (April 3, 2018), <http://archive.today/Wvh7k>.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “statements attributed to Eva Chen,” “authorized to speak,” and “Meta’s behalf” renders this Request vague and ambiguous. For purposes of responding to this Request, Meta construes “statements attributed to Eva Chen” as limited to the following statements from the Quartz article referenced in this Request: (1) “[The team’s] entire focus is focusing on the wellbeing of the community”; (2) “[m]aking the community a safer place, a place where people feel good is a huge priority for Instagram”; and (3) “I would say one of the top priorities.”

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly admitted below, Meta DENIES this Request for Admission. Meta admits that during a March 18, 2018 CornellTech @ Bloomberg interview with Scarlet Fu, and in response to a question

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1 about what Instagram is doing in response to observations that Facebook makes people feel bad, Eva
2 Chen, Head of Fashion Partnerships at Instagram, stated that “Instagram has a whole team, I think it’s
3 called . . . it’s the well-being team and they basically, their entire focus is focusing on the well-being of
4 the community. Making the community a safer place, a place where people feel good, is a huge priority
5 for Instagram. I would say one of the top priorities for the company. And so, with that in mind, whether
6 it’s a campaign like ‘Kind Comments’ encouraging people to leave kind comments on other people’s
7 Instagrams or working on a campaign called ‘Perfectly Me’ with Seventeen magazine, where we want
8 people to feel good in their own skin. Actually, I think it’s in France or Germany where there’s a hashtag
9 that’s called ‘#AcneIsNormal’ that I love, where people literally post pictures of themselves if they have
10 pimples they don’t cover it up, I think that’s great, you know? I think the most important thing is that
11 people feel comfortable and safe to express themselves on Instagram and it’s something the team takes
12 really seriously.”

13 Meta reserves the right to supplement or modify its response based upon documents or information
14 identified over the course of discovery.

REQUEST FOR ADMISSION NO. 37:

16 Admit that the statement attributed to Facebook in the following article was made by a Meta
17 employee authorized to speak on Meta’s behalf: Hilary Andersson, Social Media Apps Are Deliberately
18 “Addictive” to Users, BBC (July 4, 2018), <https://archive.ph/Hxrp8>.

RESPONSE:

20 Meta incorporates its Responses and Objections to All Requests by reference as though fully set
21 forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the
22 needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or
23 Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases
24 “attributed to,” “employee,” “authorized to speak,” and “Meta’s behalf” renders this Request vague and
25 ambiguous. For purposes of responding to this Request, Meta construes “statements attributed to
26 Facebook” as limited to the following statements from the BBC article referenced in this Request:
27 (1) “[Facebook’s products were designed] to bring people closer to their friends, family, and the things
28 they care about” and (2) “at no stage does wanting something to be addictive factor into that process.”

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Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly admitted below, Meta DENIES this Request for Admission. Meta admits that in response to the April 7, 2018 *BBC Panorama* program investigating the potential addictiveness of smartphones and social media platforms, including Facebook, a Facebook spokesperson issued the following statement: “[t]he allegations that have arisen during *BBC Panorama*’s production process are inaccurate. Facebook and Instagram were designed to bring people closer to their friends, family and the things they care about, and that purpose sits at the centre of every design decision we make. At no stage does wanting something to be addictive factor into that process and we are continually working to make sure Facebook and Instagram contribute to people’s lives in a positive way.”

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 38:

Admit that the statements attributed to Instagram and Facebook in the following article were made by Meta employees authorized to speak on Meta’s behalf: Mental Health: UK could ban social media over suicide images, minister warns, BBC (Jan. 27, 2019), <https://www.bbc.com/news/uk-47019912>.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “attributed to,” “employees,” “authorized to speak,” and “Meta’s behalf” renders this Request vague and ambiguous. For purposes of responding to this Request, Meta construes “statements attributed to Instagram” as limited to the following statements from the BBC article referenced in this Request: “Instagram responded by saying it works with expert groups who advise them on (1) ‘complex and nuanced’ issues of mental health and self-harm, [and] based on their advice [] Instagram said they (2) ‘don’t remove certain content[.]’ ‘[i]nstead [they] offer people looking at, or posting it, support messaging that directs them to groups that can help.’” Meta further construes “statements attributed to Facebook” as

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1 limited to the following statements from the BBC article referenced in this Request: “Facebook said earlier
2 that it was (1) ‘deeply sorry’ and that graphic content (2) ‘has no place on our platform.’”

3 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
4 except as expressly admitted below, Meta DENIES this Request for Admission. Meta admits that in
5 response to a January 27, 2019 Sunday Times article accusing tech companies of pushing teens to suicide,
6 Facebook issued a statement that stated, in part, that “[n]othing is more important to us than the safety of
7 the people in our community, and we work with experts every day to best understand the ways to keep
8 them safe. We do not allow content that promotes or encourages eating disorders, self-harm or suicide
9 and use technology to find and remove it. Mental health and self-harm are complex and nuanced issues,
10 and we work with expert groups who advise us on our approach. They tell us that the sharing of a person’s
11 mental health struggle or connecting with others who have battled similar issues, can be an important part
12 of recovery. This is why we don’t remove certain content and instead offer people looking at, or posting
13 it, support messaging that directs them to groups that can help.”

14 Meta further admits that in a January 23, 2019 BBC News at Six interview covering the Molly
15 Russell incident and removing harmful content on social media, Facebook’s Vice-President of Northern
16 Europe Steve Hatch stated “I’m deeply sorry for how this must have been such a devastating event for
17 their family and anybody and everyone that I have spoken to feels exactly the same” and “[i]f people are
18 posting in order to seek help, in order to seek support from communities, the experts in this area tell us
19 that is a valuable thing for them to do and can help with recovery and can help with support. If it is there
20 to sensationalize or glamorize, of course it has no place on our platform, it shouldn’t be on our platform,
21 and if we need to work harder to make sure that it isn’t on our platform then we certainly will.”

22 Meta reserves the right to supplement or modify its response based upon documents or information
23 identified over the course of discovery.

24 **REQUEST FOR ADMISSION NO. 39:**

25 Admit that the statements attributed to a Facebook spokesperson in the following article were made
26 by a Meta employee authorized to speak on Meta’s behalf: Lauren Feiner, More than 40 attorneys general
27 ask Facebook to abandon plans to build Instagram for kids, CNBC (May 10, 2021),
28

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1 [https://www.cnbc.com/2021/05/10/attorneys-general-ask-facebook-to-abandon-instagram-for-kids-](https://www.cnbc.com/2021/05/10/attorneys-general-ask-facebook-to-abandon-instagram-for-kids-plans.html)
2 [plans.html](https://www.cnbc.com/2021/05/10/attorneys-general-ask-facebook-to-abandon-instagram-for-kids-plans.html).

RESPONSE:

4 Meta incorporates its Responses and Objections to All Requests by reference as though fully set
5 forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the
6 needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or
7 Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases
8 “attributed to,” “employee,” “authorized to speak,” and “Meta’s behalf” renders this Request vague and
9 ambiguous. For purposes of responding to this Request, Meta construes “statements attributed to a
10 Facebook spokesperson” as limited to the following statements from the CNBC article referenced in this
11 Request: Facebook (1) “just started exploring a version of Instagram for kids”; (2) “[and committed to not
12 show ads] in any Instagram experience we develop for people under the age of 13”; (3) “[w]e agree that
13 any experience we develop must prioritize their safety and privacy, and we will consult with experts in
14 child development, child safety and mental health, and privacy advocates to inform it. We also look
15 forward to working with legislators and regulators, including the nation’s attorneys general”; and (4)
16 “[w]e want to improve this situation by delivering experiences that give parents visibility and control over
17 what their kids are doing. We are developing these experiences in consultation with experts in child
18 development, child safety and mental health, and privacy advocates.”

19 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
20 Except as expressly admitted below, Meta DENIES this Request for Admission. Meta admits that in
21 response to a May 10, 2021 Press Release from the New York Attorney General urging Facebook to
22 abandon its launch of Instagram Kids, Facebook stated that “[w]e’ve just started exploring a version of
23 Instagram for kids. We agree that any experience we develop must prioritize their safety and privacy, and
24 we will consult with experts in child development, child safety and mental health, and privacy advocates
25 to inform it. We also look forward to working with legislators and regulators, including the nation’s
26 attorneys general. In addition, we commit today to not showing ads in any Instagram experience we
27 develop for people under the age of 13.” Meta further admits that in response to a May 18, 2021 letter
28 from Senators Edward Markey and Richard Blumenthal and Representatives Kathy Castor and Lori

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1 Trahan calling on Facebook to abandon its plans for Instagram Kids, Facebook released a statement stating
2 “[a]s every parent knows, kids are already online. We want to improve this situation by delivering
3 experiences that give parents visibility and control over what their kids are doing. We will develop these
4 experiences in consultation with experts in child development, child safety and mental health, and privacy
5 advocates. We also look forward to working with legislators and regulators. In addition, we commit to
6 not showing ads in any Instagram experience we develop for people under the age of 13.”

7 Meta reserves the right to supplement or modify its response based upon documents or information
8 identified over the course of discovery.

REQUEST FOR ADMISSION NO. 40:

9
10 Admit that the statements attributed to Elizabeth Lagone, Meta, and “a Meta executive” in the
11 following article were made by Meta employees authorized to speak on Meta’s behalf: Adam Satariano,
12 British Ruling Pins Blame on Social Media for Teenager’s Suicide, N.Y. Times (Oct. 1, 2022),
13 <https://www.nytimes.com/2022/10/01/business/instagram-suicide-ruling-britain.html>.

RESPONSE:

14
15 Meta incorporates its Responses and Objections to All Requests by reference as though fully set
16 forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the
17 needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or
18 Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases
19 “attributed to,” “employees,” “authorized to speak,” and “Meta’s behalf” renders this Request vague and
20 ambiguous. For purposes of responding to this Request, Meta construes “statements attributed to
21 Elizabeth Lagone” as limited to the following statements from the N.Y. Times article referenced in this
22 Request: “I cannot speak to what was in Molly’s head.” To the extent that this Request asks for
23 confirmation of “statements attributed to [] a Meta executive” that are identical to the “statements
24 attributed to Elizabeth Lagone,” Meta objects to this Request as duplicative. Meta further construes
25 “statements attributed to [] Meta” as limited to the following statements from the N.Y. Times article
26 referenced in this Request: Meta’s “thoughts are with the Russell family” and Meta is “committed to
27 ensuring that Instagram is a positive experience for everyone, particularly teenagers.”
28

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Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly admitted below, Meta DENIES this Request for Admission. Meta admits that in response to a request for comments on the UK Inquest into the death of Molly Russell, wherein the Coroner concluded that Molly Russell died of “an act of self-harm whilst suffering from depression and the negative effects of online content,” Meta released a statement stating: “[o]ur thoughts are with the Russell family and everyone who has been affected by this tragic death. We’re committed to ensuring that Instagram is a positive experience for everyone, particularly teenagers, and we will carefully consider the Coroner’s full report when he provides it. We’ll continue to work with the world’s leading independent experts to help ensure that the changes we make offer the best possible protection and support for teens.” Meta admits that Elizabeth Lagone testified as a witness on behalf of Meta Platforms Ireland Ltd in the Inquest into the death of Molly Russell, however, Meta denies that the statement attributed to Elizabeth Lagone, as well as the context for which the statement was made, are accurately described in the above-mentioned article.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 41:

Admit that Meta has never implemented a feature that automatically or by default limits time spent on Meta’s Platforms for adolescent Users.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “automatically,” “or by default,” “adolescent Users,” and “time spent” renders this Request vague and ambiguous. For purposes of responding to this Request for Admission, Meta defines “adolescent Users” as “Youth Users,” users that are at least 13 years of age and under the age of 18.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission. For Teen Accounts, once teens and parents set up parental

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1 supervision, parents can choose to automatically block their teens from using Instagram at night or specific
2 time periods including school hours. Parents can also set total daily time limits for teens' Instagram usage.
3 Once a teen hits the daily time limit, the teen will be automatically blocked from accessing Instagram.
4 <https://about.instagram.com/blog/announcements/instagram-teen-accounts>.

5 Meta reserves the right to supplement or modify its response based upon documents or information
6 identified over the course of discovery.

REQUEST FOR ADMISSION NO. 42:

8 Admit that Meta has never implemented a feature that automatically or by default limits use of
9 Meta's Platforms to non-school hours for adolescent Users.

RESPONSE:

11 Meta incorporates its Responses and Objections to All Requests by reference as though fully set
12 forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the
13 needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or
14 Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases
15 "automatically," or "by default," and "adolescent Users" renders this Request vague and ambiguous.
16 For purposes of responding to this Request for Admission, Meta defines "adolescent Users" as "Youth
17 Users," users that are at least 13 years of age and under the age of 18.

18 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
19 Meta DENIES this Request for Admission. For Teen Accounts, once teens and parents set up parental
20 supervision, parents can choose to automatically block their teens from using Instagram at night or specific
21 time periods including school hours. Parents can also set total daily time limits for teens' Instagram usage.
22 Once a teen hits the daily time limit, the teen will be automatically blocked from accessing Instagram.
23 <https://about.instagram.com/blog/announcements/instagram-teen-accounts>.

24 Meta reserves the right to supplement or modify its response based upon documents or information
25 identified over the course of discovery.

REQUEST FOR ADMISSION NO. 43:

27 Admit that Meta has never implemented a feature that automatically or by default limits Meta's
28 Platforms' use in a manner that would prevent disrupting adolescent sleeping hours.

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Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “automatically,” or “by default,” and “adolescent Users” renders this Request vague and ambiguous. For purposes of responding to this Request for Admission, Meta defines “adolescent Users” as “Youth Users,” users that are at least 13 years of age and under the age of 18.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission. For Teen Accounts, once teens and parents set up parental supervision, parents can choose to automatically block their teens from using Instagram at night or specific time periods. Parents can also set total daily time limits for teens’ Instagram usage. Once a teen hits the daily time limit, the teen will be automatically blocked from accessing Instagram. <https://about.instagram.com/blog/announcements/instagram-teen-accounts>.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 44:

Admit that Meta never warned adolescent Users or their guardians about the potential risks to adolescent well-being and mental health associated with use of Meta’s Platforms.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “never,” “warned,” “adolescent,” “associated with,” “potential risks,” “adolescent well-being and mental health,” and “use” renders this Request vague and ambiguous. Meta further objects to this Request on the grounds that it assumes that the use of Meta’s platforms is “associated” with “potential risks to adolescent well-being and mental health.”

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Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly admitted below, Meta DENIES this Request for Admission. Among other things, Meta has provided information to teens and parents regarding ways to help teens have safe and positive experiences on Meta's platforms, including over 50 tools, features, and resources to help support teens and families, and help teens manage the time they spend online. Meta has published information about these tools and features and about its efforts to detect and remove malicious actors and content on its platforms that violates Meta's Community Standards, such as content that has the potential to intimidate, exclude or silence others, content that may upset or harass users of its platforms, or content that may make users feel offended or unsafe. Meta's published information includes Community Standards Enforcement Reports (CSERs) that disclose the prevalence of bullying and harassment, suicide, self-injury, and eating disorder content, and other content on Meta's platforms that violates Meta's Community Standards. Meta has made public statements related to teen safety and well-being, including, by way of example, statements regarding its tools, features, and resources to address offensive, inappropriate, or abusive comments; bullying and harassment; content relating to suicide, self-injury, and eating disorders; reports of child exploitation; and unwanted interactions from unknown or potentially suspicious adults. Meta has also made public statements relating to the safety and well-being of users on its platforms, including, by way of example, statements published on the Safety Center, the Transparency Center, and the Family Center. Nothing in this response is intended to, or does, concede the existence of any causal relationship or link between use of Meta's platforms and adolescent health or well-being.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 45:

Admit that Meta generates substantially all of its revenue from selling advertising placements on its family of apps to marketers.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the

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needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “generates,” “substantially all,” “revenue,” “selling,” “advertising placements,” “family of apps,” and “marketers” renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta ADMITS that it “generate[s] substantially all of [its] revenue from selling advertising placements on [its] family of apps to marketers,” as described in Meta’s Form 10-K. Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 46:

Admit that Meta uses the personal information it gathers about Users, regardless of age, to better target its advertising services.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “personal information,” “gathers,” “regardless of age,” “better target,” and “advertising services” renders this Request vague and ambiguous. Meta interprets “personal information” to be individually identifiable information about an individual collected online. Meta further objects to this Request as vague and ambiguous on the ground that its use of the term “Users” and “personal information” does not exclude individuals under the age of 13. Meta interprets “Users” as referring only to individuals with an account on either Facebook or Instagram, as Facebook and Instagram are the only social media services at issue in Plaintiffs’ operative complaint, and to individuals at least 13 years of age, as individuals under 13 years of age are not permitted users of Facebook and Instagram. Meta further objects to Definition No. 2 (“collect,” “collects” and “collection”) as vague and ambiguous in that Plaintiffs assign to those terms the meaning provided in 16 C.F.R. § 312.2 yet appear also to use one or more of those terms in different contexts, apparently using their more ordinary meaning. Meta does not attribute to those terms Plaintiffs’

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1 assigned meaning in this Request. Meta objects to the terms to the extent that they assume Meta
2 knowingly collects personal information from individuals under the age of 13.

3 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
4 Except as expressly admitted below, Meta DENIES this Request for Admission.

5 Meta's publicly available Privacy Policy (available at
6 [https://www.facebook.com/privacy/policy?annotations\[0\]=1.ex.41-InformationWeCollectIf](https://www.facebook.com/privacy/policy?annotations[0]=1.ex.41-InformationWeCollectIf)) explains
7 how it collects and uses certain information from Users. As disclosed in the Policy, Meta uses this
8 information for a variety of purposes, including to promote safety, security, and integrity by investigating
9 and addressing violations of its policies, to communicate with users, and to provide advertising services.
10 As also disclosed in the Policy, Meta's ads system uses this information to understand users' interests and
11 preferences and personalize the ads shown to users on Meta's products. Meta does not allow individuals
12 under the age of 13 to access Facebook or Instagram, and it does not allow advertisers to target
13 advertisements to individuals under the age of 13. Meta also limits the information that can be used to
14 show advertisements to people under the age of 18, as described at
15 <https://www.facebook.com/privacy/dialog/how-ads-are-different-for-teens>. As a result, Meta does not
16 use user information to better target its advertising services "regardless of age."

17 Meta reserves the right to supplement or modify its response based upon documents or information
18 identified over the course of discovery.

REQUEST FOR ADMISSION NO. 47:

20 Admit that Meta associates information collected about individuals who visit Facebook or
21 Instagram pages without logging in (including information about how they interact with Facebook or
22 Instagram) with one or more identifiers described in the definition of "personal information" in 16 CFR
23 § 312.2.

RESPONSE:

25 Meta incorporates its Responses and Objections to All Requests by reference as though fully set
26 forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the
27 needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or
28 Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases

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“associates,” “information collected,” “visit Facebook or Instagram pages,” “without logging in,” “interact,” and “identifiers” renders this Request vague and ambiguous. Meta further objects to Definition No. 2 (“collect,” “collects” and “collection”) as vague and ambiguous in that Plaintiffs assign to those terms the meaning provided in 16 C.F.R. § 312.2, yet also appear to use one or more of those terms in different contexts, apparently using their more ordinary meaning. Meta does not attribute to those terms Plaintiffs’ assigned meaning in this Request. Meta objects to the terms to the extent that they assume Meta knowingly collects personal information from individuals under the age of 13.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly admitted below, Meta DENIES this Request for Admission.

Meta’s publicly available Privacy Policy explains how it collects and uses certain information, including certain information from people who visit certain Facebook and Instagram webpages without logging into an account as described at [https://www.facebook.com/privacy/policy?annotations\[0\]=1.ex.41-InformationWeCollectIf..](https://www.facebook.com/privacy/policy?annotations[0]=1.ex.41-InformationWeCollectIf..) Meta does not knowingly collect personal information from individuals under the age of 13.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 48:

Admit that the personal information You collect from individuals who visit Facebook or Instagram pages without logging in is used for targeting advertisements to those individuals.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases “from individuals,” “visit Facebook or Instagram pages,” “without logging in,” and “used for targeting advertisements” renders this Request vague and ambiguous. Meta interprets “personal information” to be individually identifiable information about an individual collected online. Meta further objects to Definition No. 2 (“collect,” “collects” and “collection”) as vague and ambiguous in that Plaintiffs assign

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1 to those terms the meaning provided in 16 C.F.R. § 312.2, yet also appear to use one or more of those
2 terms in different contexts, apparently using their more ordinary meaning. Meta does not attribute to those
3 terms Plaintiffs' assigned meaning in this Request. Meta objects to the terms to the extent that they assume
4 Meta knowingly collects personal information from individuals under the age of 13.

5 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
6 Except as expressly admitted below, Meta DENIES this Request for Admission.

7 Meta's publicly available Privacy Policy explains how it collects and uses certain information,
8 including certain information from people who visit certain Facebook and Instagram webpages without
9 logging into an account as described at
10 [https://www.facebook.com/privacy/policy?annotations\[0\]=1.ex.41-InformationWeCollectIf](https://www.facebook.com/privacy/policy?annotations[0]=1.ex.41-InformationWeCollectIf). As
11 disclosed in the Policy, that information may be used to show such individuals ads for Meta's products
12 through the Meta Audience Network if Meta cannot recognize them as registered users of Meta's products.

13 Meta reserves the right to supplement or modify its response based upon documents or information
14 identified over the course of discovery.
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Dated: April 1, 2025

Respectfully submitted,

COVINGTON & BURLING LLP

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on April 1, 2025 on the following:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on April 1, 2025.

DATED: April 1, 2025

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen